



United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

December 21, 2020

By ECF

The Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

MEMO ENDORSED

Re: *Edwards v. Gizzi, et al.*, No. 20 Civ. 7371 (KMK) (S.D.N.Y.)

Dear Judge Karas:

This Office represents defendants Deputy United States Marshal Drew Gizzi and District Security Officer Robert Johnsen (together, the "Federal Defendants") in the above-captioned matter brought pursuant to *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971).¹ We write respectfully to request a 35-day extension of the Federal Defendants' time to answer, or otherwise respond, to the complaint, from December 28, 2020, to February 1, 2021. We make this request because this Office recently obtained authority from the Department of Justice to represent the Federal Defendants in their individual capacity, and we need the additional time to assess the allegations in the complaint in consultation with our clients. This is the Federal Defendants' first request for an extension of the deadline. Because Plaintiff is proceeding *pro se* and communicating with him is cumbersome due to his incarceration, this Office has not sought his consent for this request.

We thank the Court for its consideration of this request.

Granted.

So Ordered.

12/28/20

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney for the
Southern District of New York

By: /s/ Danielle J. Levine
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cc: Clint Edwards (via U.S. Mail)

¹ This Office does not represent the remainder of the individual defendants because they are employed by a private contractor.